



Human Rights Policy

Nera Kritis SA

Effective: January 1st, 2021

Version 1, EN



Introduction

Nera Kritis SA is committed through this policy to respecting and protecting all Human Rights as set out in:

- The United Nations Universal Declaration of Human Rights
- The Fundamental Conventions of the International Labor Organization (ILO)
- The Principles of the UN Global Compact.
- The UN Guiding Principles on Business and Human Rights

Respect for Human Rights is provided for in both the Company's Business Code of Conduct and the Sustainable Procurement Policy. It is considered as one of the fundamental responsible practices for employees, as well as for the Company's supply chain, subcontractors, and associates.

This Policy establishes a framework for the respect and protection of Human Rights within the Company but also in its network.

1.1 Purpose

The purpose of this policy is to underline that Nera Kritis SA enforces a zero-tolerance policy in violations of Human Rights. This takes the form of both directly, as in Nera Kritis SA's on activities but also indirectly by immediately suspending or terminating business with entities that are reasonably suspected to be in breach of the aforementioned Human Rights. In addition, this policy also serves to raise awareness and ensure the commitment of Nera Kritis SA employees, subcontractors, suppliers and associates in protecting and respecting Human Rights.

Scope and Applicability

This Policy applies to all employees, partners and subcontractors for all activities related to Nera Kritis SA, both in premises of Nera Kritis SA but also outside for all persons acting as representatives for Nera Kritis SA.

Implementation, validity, and amendment

The Continuous Improvement Strategy dpt as well as the Head of Quality, cooperate for drafting and revising this policy.

The CIS dpt is responsible for training staff members and the implementation of this policy.

This policy is reviewed annually and considering national and international developments, may be revised if required.

Communication

This policy has been communicated to all staff and stakeholders through internal means and it is also available through the company website.

Occupational Health & Safety

Nera Kritis SA considers the Health and Safety of its employees of utmost importance and commits to a safe working environment. Nera Kritis SA focuses on prevention, adopts high standards of health and safety, assesses and manages relevant risks in a systematic manner, while supporting and consistently spreading a corporate culture aimed at promoting health and safety at work as top priorities. Through processes that are implemented, Nera Kritis SA is committed to achieving the goal of “NO ACCIDENT AND NO OCCUPATIONAL DISEASE AT WORK” which is one of the main challenges in the industrial sector.

Working Conditions

Nera Kritis SA is committed to maintaining a work environment based on trust, dialogue and mutual respect, while protecting the well-being and the work-life balance of its employees. Nera Kritis SA is committed to ensuring decent wages and working hours, based on applicable laws and industry standards for work schedule, overtime and leave.

Child Labor

Nera Kritis SA is committed to operating in accordance with all laws concerning the minimum age for hiring employees, at least according to convention 138 of the International Labor Organization (ILO) or stricter, in all areas where it operates. The Company prohibits the employment of minors under the age of 18.

Nera Kritis SA voluntarily commits and complies with the 10th Principle of the United Nations Global Compact, which is based on zero tolerance of child labor incidents and circumstances in its supply chain and consequently in its entire range of

activities. Any supplier reasonably suspected to be using child labor, regardless of laws in his jurisdiction, will be suspended immediately from the supply chain.

Forced Labor and Human Trafficking

Nera Kritis SA is committed to taking all measures necessary, to avoid any involvement, direct or indirect, to any form of compulsory or forced labor as well as human trafficking, as referenced by “The Modern Slavery Act” of 2015 of the UK parliament. Nera Kritis SA also recognizes the integral need to be aware of any similar activities in its supply chain.

Exploitation or any form of forced labor is strictly prohibited in accordance with its Business Code of Conduct.

Nera Kritis SA demonstrates a zero-tolerance policy regarding incidents or circumstances deemed as any form of Modern Slavery according to “The Modern Slavery Act” of 2015.

Equal Opportunities

Nera Kritis SA is committed to offering equal opportunities regardless of race, sex, color, national or social origin, religion, age, disability, sexual orientation and political beliefs. Discrimination and harassment are prohibited in accordance to the Anti-Harassment corporate policy. Procedures for recruiting members of the staff, training, education, performance appraisal and termination of cooperation are free from discriminations as stated above.

Nera Kritis SA does not tolerate any kind of offensive or inappropriate behavior, unfair treatment or retaliation. According to its Business Code of Conduct and Anti-Harassment policy, physical or verbal harassment of a sexual, racist or slanderous nature is prohibited in the workplace but also under any circumstances related to work outside the workplace.

Nera Kritis SA respects the privacy of its workforce data (GDPR) when collecting personal information as stated in its IP Rights and IT policy.

Freedom of association

Nera Kritis SA also fully allows its staff members rights of freedom of association and collective bargaining, without any fear for retaliation, as long as it is within the framework of national legislation.

Disciplinary practices

Nera Kritis SA's disciplinary practices are implemented, first and foremost as a means to deter any illegal or harmful conduct to any person or legal entity in accordance to legislation or the company's policies.

Complaints brought to attention, through the whistleblowing process are always investigated promptly and discreetly in order to safeguard the whistleblower and eliminate any form of retaliation, regardless of the complaint/report being made anonymously or not.

Nera Kritis SA is committed to implementing its disciplinary practices in a consistent and fair manner in regards to all its employees and all personal characteristics, such as gender, national origin, religion, etc. do not affect the results of the investigation of a possible misdemeanor or the severity of a possible sentence.

Local Community Rights

Nera Kritis SA is committed to communicating and consulting with local communities, during its activities, in order to prevent, mitigate and eliminate potential adverse effects of its operation, by taking appropriate measures. Moreover, it is committed to respecting and supporting local community rights regarding the use of land, of natural resources and especially water since these are considered as key elements of the communities' sustainability.

Nera Kritis SA also ensures that appropriate action is taken to address the concerns of local communities regarding the potential negative impact of its activities on the citizens.

Nera Kritis SA is committed to participating, where needed, in dialogue with the social partners of its local communities on human rights issues related to its operation.